

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KHUSHWINDER SINGH,

Plaintiff,

v.

ALEDADE, INC.,

Defendant.

No.: 2:21-cv-0410-KKE

STIPULATED MOTION AND
ORDER FOR EXTENSION OF
TIME TO DISCLOSE EXPERT
TESTIMONY UNDER FRCP
26(a)(2)

NOTE ON MOTION CALENDAR:
March 25, 2025

Plaintiff Khushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”), by and through their attorneys of record, submit this Stipulation and Proposed Order, and respectfully request that the Court enter the proposed order for an extension of time for the parties to disclose expert testimony under Federal Rule of Civil Procedure 26(a)(2).

1. On November 22, 2024, Defendant served its First Set of Interrogatories and Requests for Production of Documents on Plaintiff.

2. On January 13, 2025, Plaintiff served his initial responses to Defendant’s Discovery Requests (“Plaintiff’s Responses”).

3. Plaintiff has not completed his production of documents and information responsive to Defendant’s Discovery Requests.

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4. The parties met and conferred on March 21, 2025, and Plaintiff represented that he will comply with his document discovery obligations by March 28, 2025.

5. Pursuant to the Court's Scheduling Order, the parties' deadline to disclose expert testimony under Federal Rule of Civil Procedure 26(a)(2) is March 31, 2025. (ECF No. 53).

6. Defendant cannot fulsomely comply with its expert disclosure obligations under F.R.C.P. 26(a)(2) until Plaintiff completes his production of documents and information because the missing discovery is material to such expert disclosures. The parties stipulate that additional time is required to disclose experts and expert opinions in this matter.

7. Accordingly, the parties respectfully request that the Court extend the deadline for disclosure of expert testimony under F.R.C.P. 26(a)(2) from March 31, 2025 to May 28, 2025. All other dates will remain as set forth in the Court's October 15, 2024 Order Setting Jury Trial Date and Related Dates (Dkt. 53).

DATED this 25th day of March, 2025. I certify that this document contains 258 words, in compliance with the Local Civil Rules.

THE SEATTLE LITIGATION GROUP,
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ORDER

IT IS SO ORDERED.

DATED this 27th day of March, 2025.



Kymberly K. Evanson
United States District Judge